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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

**BANK OF AMERICA, N.A., AS  
SUCCESSOR BY MERGER TO BAC HOME  
LOANS SERVICING, L.P.**

VS.

NORTH AMERICAN TITLE INSURANCE COMPANY, DOE INDIVIDUALS I through X; and ROE CORPORATIONS XI through XX, inclusive,

## Defendants.

Case No.: 2:21-cv-00415-KJD-VCF

**STIPULATION AND ORDER TO  
EXTEND DEADLINE TO FILE A  
~~PROPOSED~~ DISCOVERY PLAN**

### (Third Request)

Plaintiff, Bank of America, N.A. as Successor by Merger to BAC Home Loans Servicing, LP (“BANA”) and Defendant, North American Title Insurance Company (“NATIC”), by and through their respective undersigned counsel, hereby stipulate and agree as follows:

This is one of many actions pending before the Nevada state and federal courts involving a lender's alleged entitlement to coverage under a title insurance policy following an HOA foreclosure sale. After the Complaint was filed, BANA and NATIC entered into global settlement negotiations to discuss the resolution of approximately 100 similar title insurance claims, including this case. The Parties stipulated to stay this case to achieve that purpose on April 7, 2021. ECF No. 8. On July 6, 2021, the Parties submitted a Joint Status Report [ECF No. 10], and

on April 29, 2022, the Court issued a Minute Order requiring that the Parties to file settlement documents, stipulation for dismissal or joint status report within 14 days. ECF No. 11.

The Parties submitted a Joint Status Report on November 8, 2022, wherein the Parties advised that the September 29, 2022 mediation was unsuccessful and that the Parties would submit a joint proposed discovery plan by December 8, 2022. ECF No. 14. The deadline was subsequently extended twice and is currently due February 8, 2022. ECF Nos. 20, 22. While the proposed joint discovery plan has been drafted, the Parties need additional time to review and finalize the terms and are requesting an additional seven (7) days to do so, through and including February 15, 2023.

Counsel for NATIC does not oppose the request for an extension. This is the third request for an extension which is made in good faith and not for purposes of delay.

## **IT IS SO STIPULATED.**

DATED this 8<sup>th</sup> day of February, 2023.

DATED 8<sup>th</sup> day of February, 2023.

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## *Loans Servicing, LP*

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**Attorneys for Defendant**

*Attorneys for Defendant, North American  
Title Insurance Company*

## *Title Insurance Company*

## IT IS SO ORDERED.

Dated this 9th day of February . 2023.

*Curtis Baker*

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UNITED STATES MAGISTRATE JUDGE